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November 18, 2021

**By ECF**

Hon. Gabriel W. Gorenstein  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007-1312

Re: *GateGuard, Inc. v. Goldmont Realty Corp., et al.*  
Case No.: 1:20-cv-01609-AJN-GWG

Dear Judge Gorenstein:

This office represents defendants Goldmont Realty Corp., Leon Goldenberg and Abi Goldenberg in the above referenced action (collectively, the "Defendants"). Pursuant to Your Honor's Order of November 17, 2021 (Docket # 78), and with respect to Docket # 77, Defendants' counsel has reached out to plaintiff's counsel to arrange a time to meet and confer. Defendants apologize for the delay in responding to Plaintiff's post-deposition discovery requests which is due to several attorneys' current involvement in an ongoing trial. Such discovery will be produced by the end of the week.

We thank the Court for its consideration of the above.

Respectfully Submitted,  
By: /s/ Shira Goldman Moyal  
Shira Goldman Moyal

cc: Ariel Reinitz, Esq. (via ECF)